

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
DURHAM DIVISION

Civil Case No. 1:21-cv-663-WO-LPA

Z.S.,

Plaintiff,

v.

DURHAM COUNTY,

Defendant.

**DECLARATION OF  
DR. JEFFREY C. HOLDEN, PH.D.**

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I, Jeffrey C. Holden, make the following declaration based on my personal knowledge and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I am over 18 years of age and competent to make this declaration.
2. I live in Raleigh, North Carolina.
3. I am the court-appointed Guardian ad Litem for Z.S. in the above-captioned matter.
4. I have reviewed the settlement-in-principle between Z.S. and Defendant Durham County.
5. The settlement provides Z.S. monetary damages and will result in changes to Durham County's protocols that will prioritize placement of medically fragile and complex children in its child welfare custody, like Z.S., in the community.
6. When filed, this case sought, in addition to monetary damages, an order requiring

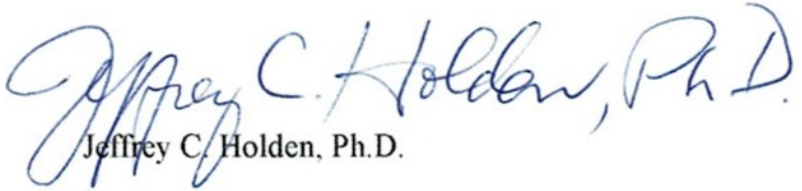
Durham County to place Z.S. in the community. I am aware that Durham County lost custody of Z.S. in or around July 2022, and that custody of Z.S. has been returned to his natural parents, which affects the availability of this remedy to Z.S.

7. I believe the settlement terms are a fair resolution of Z.S.'s claims and am prepared to execute the settlement if approved by the Court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: December 5, 2022

By:

  
Jeffrey C. Holden, Ph.D.